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FILED

9/30/2021 9:51 AM

IRIS Y. MARTINEZ

CIRCUIT CLERK

COOK COUNTY, IL

15023145

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

LASHAWN GARRETT

PLAINTIFF,

VS.

WALMART, INC.

DEFENDANT,

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2021L009656

Case No.

Cal.

COMPLAINT AT LAW

NOW COMES the Plaintiff, LASHAWN GARRETT, by and through her attorneys, Faklis Tallis, & Mead, and complaining of the Defendant, WALMART, INC., and states as follows:

1. That on and prior to October 1, 2020, the Defendant, WALMART, INC., owned, operated, managed, maintained, and controlled a store located at 850 Barrington Road in the Village of Streamwood, County of Cook, State of Illinois.
2. That on and before October 1, 2020, the Defendant, WALMART, INC., had a duty to maintain, operate and control its premises in such a way that it would remain free of dangerous conditions for people on the premises.
3. That on October 1, 2020, the Defendant, WALMART, INC., well knowing its duty in this regard, carelessly and negligently caused and permitted said premises to become and remain in a dangerous condition for persons using said premises, although the Defendant knew or in the exercise of ordinary care, should have known of said dangerous condition.

EXHIBIT A



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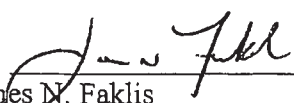
4. That on October 1, 2020, the Plaintiff, **LASHAWN GARRETT**, was lawfully on the premises at said store and walking in an aisle.
5. That on October 1, 2020, the Plaintiff, **LASHAWN GARRETT**, slipped and fell on a slippery substance on the floor in an aisle at the aforementioned premises of the Defendant, **WALMART, INC.**
6. That the Defendant, **WALMART, INC.**, was then and there guilty of one or more of the following careless and negligent acts and/or omissions:
 - a. Improperly operated, managed, maintained and controlled the aforesaid premises, so that as a direct result and the proximate result thereof, the plaintiff was injured;
 - b. Caused, allowed, and/or permitted a slippery substance to become and remain on the floor in said aisle for an unreasonable period of time;
 - c. Failed to properly and adequately remove the slippery substance from said aisle after having actual and/or constructive notice of the same;
 - d. Failed to make a reasonable inspection of the aforementioned premises and said aisle when the Defendant knew or should have known that said inspection was necessary to prevent injury to the Plaintiff; and,
 - e. Failed to warn the Plaintiff of the dangerous condition of said aisle, when the Defendant knew or should have known that said warning was necessary to prevent injury to the Plaintiff.
7. That as a direct and proximate result of one or more of the foregoing negligent acts or omissions of the Defendant, **WALMART, INC.**, the Plaintiff, **LASHAWN GARRETT**, sustained injury, has lost and will lose in the future financial gains which she otherwise would have made and acquired; has been and will be kept from attending to her ordinary affairs; and has become liable for large sums of money for medical and hospital care and attention.

Wherefore, Plaintiff, **LASHAWN GARRETT**, prays for judgment against the Defendant, **WALMART, INC.**, in an amount in excess of Fifty Thousand (50,000) Dollars.



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Respectfully submitted,

By: 
James N. Faklis
Attorney for the Plaintiff

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